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June 5, 2002

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The Honorable Michael K. Powell
Chairman
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: *Ex Parte* Presentation
ET Docket 01-278; RM-9375; RM-10051
Radar Detector Interference

Dear Chairman Powell:

Microspace Communications Corporation ("Microspace"), by its counsel, supplements the extensive record in ET Docket Number 01-278 by further demonstrating the actual interference radar detectors cause to satellite operations. Additionally, Microspace brings to the Commission's attention the technical and financial hardship faced by it and its customers until the Commission adopts regulations that properly limit emissions from radar detectors.

Microspace provides professional satellite video, data and audio broadcast services for business applications. Microspace provides essential services to weather information providers, financial information networks, paging carriers of all sizes and other customers that rely on satellite service to provide real-time information to clients. As the attached *Microspace Radar Interference Study* ("Microspace Study") illustrates, these services have been severely interrupted by interference from radar detectors.

Microspace operates on Loral/Skynet, PANAMSAT and SES/Americom satellites. These satellite operators and Hughes Network Systems have documented in comments and other

filings in this proceeding the interference received by satellite service providers from radar detectors. The independent Microspace Study provides detailed information on its tests and experiences to further support the interference concerns that have already been reported in this proceeding by other satellite operators.

The Microspace Study illustrates how one of its customers, Muzak, an industry leader in providing businesses with music, messages and marketing on hold, is experiencing severe signal degradation, outages and losses of service and is unable to provide reliable service to its many customers. The cause of the interference is radar detectors. A failure by the FCC to take action against this interference will severely impede businesses that rely on real-time satellite transmissions.

Because Microspace's services are indispensable to the weather information industry and the paging industry, a failure by the FCC to take action creates a serious safety risk to the American public. Paging companies supplying hospitals and doctors with paging service are receiving intermittent outages that mimic the interference that radar detectors are causing to other VSAT services. Moreover, weather information providers depend on satellite services to deliver real-time weather graphics and text to the Federal Aviation Administration (FAA). A television station and an airport FBO location that each rely on satellite service for up-to-date weather information have experienced outages that have been directly traced to radar detectors in employee's automobiles. Radar detector interference to satellites causes serious public safety risks.

To complement the record in this proceeding, Microspace has engaged in its own study of the interference to satellite transmissions from seven different models of radar detectors and has documented the interference created by radar detectors.

Microspace and other VSAT operators operating in the 11.7 to 12.2 GHz band, which has been specifically allocated by the FCC for fixed satellite service, should not be subject to interference from unlicensed Part 15 devices. Microspace urges the Commission to immediately adopt emissions limitations on radar detectors. Specifically, Microspace supports the solution to radar detector interference proposed by the Satellite Industry Association in its May 31, 2002 *ex parte* filing. The Commission's rules should be amended to include a limit of 85 $\mu\text{V}/\text{meter}$ at a distance of 3 meters in the frequency range of 10.7-12.7 GHz in order to adequately protect Ku band earth stations from harmful interference from radar detectors. Additionally, the current Part 15 emission limits above 30 MHz should also apply to radar detectors.

Microspace urges the Commission to order the removal from operation of existing radar detectors that do not meet any newly adopted emission limitations and preclude the distribution of any radar detectors that do not meet any newly adopted emission limitations.

The Honorable Michael K. Powell

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Pursuant to the Commission's rules on *ex parte* filings, we are filing a copy of this filing and its attachments in the record of the above-referenced proceeding. Please contact Marvin Rosenberg at (202) 457-7147 if you have any questions.

Sincerely yours,

A handwritten signature in black ink, appearing to read 'H. Rosenberg', with a stylized flourish at the end.

Marvin Rosenberg
Holly Rachel Smith
*Counsel to Microspace Communications
Corporation*

Enclosures

cc: Commissioner Kathleen Q. Abernathy
Commissioner Kevin J. Martin
Commissioner Michael J. Copps
Hugh Van Tuyl
Julius Knapp
Geraldine Matise
Ira Keltz

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